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February 28, 2008

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

RE: EB Docket 06-36

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. Section 64.2009(e), Embarq hereby submits the annual CPNI Certification for 2007 for its affiliates listed in "Attachment A" of the attached document.

Please feel free to contact me if you require additional information.

Respectfully submitted,

David C. Bartlett
Vice President
Federal Government Affairs

cc: Telecommunications Consumers Division, Enforcement Bureau
Best Copy and Printing, Inc.

Attachment

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**Annual 47 C.F.R. 64.2009 CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: March 1, 2008

Name of company covered by this certification: Embarq

Form 499 Filer ID: see attached

Title of signatory: Chief Privacy Officer

I, Nancy Shelledy, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how Embarq's procedures ensure that Embarq is in compliance with the requirements set forth in section 64.2001 *et.seq* of the Commission's rules.

Embarq has not taken any actions against data brokers in 2007.

Embarq has not received any customer complaints in the past year concerning the unauthorized release of CPNI.


Nancy Shelledy

Embarq Corporation Form 499 Filer ID: 822076

- Embarq Florida Inc
- Carolina Telephone and Telegraph Company LLC
- Central Telephone Company
- United Telephone Southeast LLC
- Central Telephone Company of Virginia
- United Tel Company of the Carolinas LLC
- United Telephone Company of Ohio
- United Telephone Company of Indiana, Inc.
- United Telephone Company of New Jersey, Inc.
- The United Telephone Company of Pennsylvania LLC
- United Telephone Company of Southcentral Kansas
- United Telephone Company of Eastern Kansas
- United Telephone Company of Kansas
- Embarq Minnesota, Inc.
- Embarq Missouri, Inc.
- United Telephone Company of the West
- United Telephone Company of Texas, Inc
- Central Telephone Company of Texas
- United Telephone Company of the Northwest

Embarq Communications Inc. Form 499 Filer ID: 825591

Statement of Compliance Procedures for CPNI 2007 CPNI Certification

Methods for Obtaining Customer Approval

Embarq uses the opt-out method to obtain customer approval to utilize CPNI for marketing purposes. Customers are able to opt-out at no cost and to effectuate that choice whenever they choose. Embarq informs customers of these opt-out methods in CPNI notices, which are sent to customers upon initiation of service and every two years thereafter.

Consumer customers are instructed to call Customer Care to make or change their CPNI elections; the number is routed to an IVR after hours. The Customer Care representative records the customer's election in Service Order Entry (SOE), which is then stored in CIDS (Customer Information Data Store). Business local customers are instructed to call Customer Care to make or change their CPNI election. The Customer Care representative records the customer's local service election in Service Order Entry (SOE), and it is then stored in the Customer Information Data Store (CIDS). Business long distance customers are instructed to call an Interactive Voice Response (IVR) unit and follow prompts to make their long distance CPNI election. The IVR is available 24 hours a day, seven days a week, to capture opt-outs. All customers have the option to send an e-mail to the Office of Privacy to opt-out of CPNI at any time.

A customer's account is coded with either a "Y" or "N" in the consent flag, depending on the customer's response. If a customer does not respond to a CPNI notice within 60 days of service initiation, the customer is considered to have approved the use, disclosure and access to CPNI, and the account is coded with a "Y." If the customer denies approval ("N"), that decision remains in effect until the customer affirmatively grants permission to use CPNI. Within the first 60 days of service initiation a unique CPNI code is assigned and there is no out of category marketing to the customers who have this code, with the exception of when the script for consent is read by a rep, which allows agents to market for the purpose of the one call only.

How CPNI Authorization Records Are Maintained/ Used

The Database Marketing (DBM) Group generates customer lists for all marketing campaigns. Campaigns are implemented by the Marketing group, which creates a strategy brief containing the products offered and the criteria for selecting customers to be used, allowing DBM to generate a campaign list that meets those requirements and deliver it to the requestor in the Marketing group. Before conducting marketing campaigns that utilize CPNI, DBM pulls only those accounts with a CPNI indicator of Y if the campaign will utilize CPNI to market services out of category. Use of the CPNI by 3rd parties for marketing campaigns is also documented. Documentation of campaigns is maintained for a year.

Customer Notice of CPNI Rights/ Date of Most Recent Notification

Embarq provides new customers with a CPNI notice at the time they establish service and sends renewal CPNI notices to existing customers every two years. The most recent biennial notice was sent in April 2007.

New consumer and business customers are notified of their CPNI rights via a notice contained in the fulfillment package that is sent following the customer's service order. Daily, all new orders are batched and fed through a process that identifies customers requiring a fulfillment package. The resulting file is used by a third-party vendor to print and mail the fulfillment package within a few days of order entry.

CPNI notification for customers in the Large Customer segment is handled via contractual language in the customer's contract. Major Account customers (i.e., accounts that request a non-standard billing format) are sent a packet containing a CPNI notification at the time their service is established.

A copy of the current notification verbiage is attached.

Company Procedures for CPNI Disclosure

Effective December 8, 2007, Embarq Methods and Procedures (M&Ps) for Business and Consumer representatives were revised to require a password for release of call detail records (CDR) when requested by telephone. If a customer does not have a password, reps will offer to call the customer back at the phone number of record to provide the information or alternatively will offer to mail the call records to the billing address on the account. Reps now encourage customers to establish a password to safeguard their account information. Passwords are based on response to one of a list of questions that include name of first grade teacher, name of first pet, etc. M&Ps for face-to-face transactions in retail environments that involve CPNI require that the customer present a photo ID that matches the customer responsible for billing or authorized user for that account.

Also effective December 8, 2007, a new process was established to notify customers of password and address changes to accounts. For password changes, Embarq has a manual process that is triggered by the rep via a letter request which is systematically sent to the Consumer and Business Offline Centers for fulfillment. The current process for notifying customers of billing address changes is via a back-end process that monitors billing address changes made in the order entry system. The information is formatted into a file that contains the customer's name and old billing address and is handed off to a letter fulfillment vendor which sends the notification via US Mail.

To establish a password for an on-line account, a customer can choose from a variety of questions such as name of first grade teacher, name of first pet, etc. When on-line account passwords are changed, Embarq sends e-mail notification to the e-mail address on record.

For release of non-CDR CPNI, standard identity verification methods are used and include password, account number, other information from the account (alternate can be reached number, numbers called, etc) or last four digits of SSN.

For customers who have a CPNI indicator of "No", service rep M&Ps specify how to obtain one-time use permission for using CPNI.

Training of Company Personnel

Consistent with Embarq's commitment to preserving customer privacy, the company has implemented a variety of training programs for its employees regarding the company's policies and employees' obligations to protect customer information. All new Customer Care representatives receive CPNI training as part of their initial job training. The CPNI training program explains Embarq's legal obligations regarding the access, use, storage, and disclosure of CPNI and discusses the application of the FCC's rules to the company's operations. On an ongoing basis, Customer Care representatives have CPNI resources available in their online reference repository. Training for all Embarq employees to educate them on the new CPNI rules was initiated in December 2007 and will be complete by the end of first quarter 2008.

Under Embarq's standard procedures, only those persons with duties that require access to CPNI to perform their job functions are eligible for such access, and access is controlled through User IDs and passcodes. Embarq has adopted a disciplinary process, which has been incorporated into the company's corporate compliance procedures and communicated to employees, to address any employee mishandling or misuse of CPNI. Corporate Security or Human Resources personnel investigate instances of potential improper access to or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action up to and including termination will follow, with such termination being highly likely for any significant violation.

When sharing CPNI with independent contractors and joint venture partners, Embarq enters into confidentiality agreements which require these parties to protect the information and comply with the law. Contract terms require independent contractors and joint venture partners to have appropriate protections in place to ensure the ongoing confidentiality of the CPNI; limit access to persons who have a need to know such information in connection with the performance of the contract and are bound by specified confidentiality obligations; and restrict the use of CPNI solely to the performance of the contract, in connection with the provisioning and marketing of communications related services and products. Effective with the FCC's 2007 CPNI order, third parties who have access to CPNI have become Embarq agents.

Actions Taken Against Data Brokers for Unauthorized Access to Customer Records

Embarq had no instances of data brokers obtaining unauthorized access to customer records in 2007.

Summary of Customer Complaints Concerning Unauthorized Release of CPNI

Potential sources for capturing customer complaints regarding unauthorized use of CPNI include calls to the business office, calls to the executive hotline, and e-mails to the Office of Privacy. Embark had no customer complaints regarding the unauthorized release of CPNI in 2007.

EMBARQ CPNI CUSTOMER NOTICE

Customer Proprietary Network Information (CPNI) Use of Account Information

As EMBARQ provides services to you, EMBARQ develops Information about the quantity, technical configuration, type, destination, amount of Services you use, and other Information found on your bill ("Customer Information"). Under federal law, you have a right, and EMBARQ has a duty, to protect the confidentiality of your Customer Information. It's an obligation that EMBARQ takes seriously.

In order to serve you in the most effective and efficient manner, EMBARQ may use or share your Customer Information with others in the EMBARQ™ Family of Companies for purposes of determining and offering other EMBARQ™ products and services that may interest you. The EMBARQ™ Family of Companies includes the local, long distance, and wireless divisions of EMBARQ Corporation that provide a growing suite of communications-related products and services. EMBARQ may also disclose, share or permit access to your Customer Information on a limited, as-needed basis with trusted agents who assist EMBARQ in providing you with communications-related services. These agents share the responsibility for protecting your Customer Information. EMBARQ will not disclose or sell Customer Information to third parties, unless otherwise required to do so by operation of law.

If you so desire, you may "decline," effectively preventing EMBARQ from using or sharing your Customer Information with others within the EMBARQ™ Family of Companies for the purpose of offering other products and services not related to your current services by calling 877-901-1012 anytime. After hours, feel free to send an e-mail to privacy@embarq.com. For users who are deaf or hard of hearing, TTY service is available. To notify EMBARQ regarding your local and/or long distance services, you can contact a TTY operator by calling 800-877-8973. Request the TTY operator to dial the appropriate number listed above and notify EMBARQ that you do not want EMBARQ to use your Customer Information.

If you decide to decline it will not have any impact on your current EMBARQ™ services. Also, your decision on whether or not to decline is valid until you decide to change it. You may, at any time, decline or revoke your previous decision to decline by calling the appropriate number listed in the previous paragraph. EMBARQ will not use your Information for 33 days after mailing this notice to you to give you time to make your choice.